

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

J. NOAH, B.V. : CIVIL ACTION

: NO. 20-cv-20560 (SDW)(LDW)

vs.

WILLIE J. MAXWELL, II d/b/a :
ZOO GANG TOURING ET AL.

REQUEST FOR ENTRY OF DEFAULT

To: OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Please enter default in favor of plaintiff J. NOAH, B.V. and against defendants WILLIE J. MAXWELL, II d/b/a ZOO GANG TOURING and ZOO GANG MUSIC, LLC d/b/a ZOO GANG TOURING pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for failure to plead or otherwise defend the above captioned action as fully appears from the court file herein and from the attached Declaration.

Respectfully submitted,

Dated: June 15, 2021

PETER BOWERS, P.C.
441 N. 5th Street, Suite 100
Philadelphia PA 19123
215-440-0300

By: /Alexander J. Ginsburg, Esq./

Counsel for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
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:

ENTRY OF DEFAULT

I, William T. Walsh, Clerk of Court of the United States District Court for the District of New Jersey, do hereby certify that the defendants WILLIE J. MAXWELL, II d/b/a ZOO GANG TOURING and ZOO GANG MUSIC, LLC d/b/a ZOO GANG TOURING have not filed an answer or otherwise moved with respect to the Complaint herein. The default of defendants WILLIE J. MAXWELL, II d/b/a ZOO GANG TOURING and ZOO GANG MUSIC, LLC d/b/a ZOO GANG TOURING is hereby noted pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated as of: June 15, 2021

WILLIAM T. WALSH

Clerk of Court

By: _____

Deputy Clerk

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ZOO GANG TOURING ET AL.**

:

ORDER OF DEFAULT

The Complaint in this action having been duly served on defendants WILLIE J. MAXWELL, II d/b/a ZOO GANG TOURING and ZOO GANG MUSIC, LLC d/b/a ZOO GANG TOURING (see Complaint and Affidavits of Service, collectively Docs. #1, #14, #15) and defendants having failed to plead or otherwise defend in this action, and said default having been duly noted.

NOW, on request of Alexander J. Ginsburg, Esquire, of Peter Bowers, P.C., the attorney for plaintiff J. NOAH, B.V., an Order of Default is entered in favor of plaintiff J. NOAH, B.V. and against defendants WILLIE J. MAXWELL, II d/b/a ZOO GANG TOURING and ZOO GANG MUSIC, LLC d/b/a ZOO GANG TOURING

Dated: June 15, 2021

By: _____

United States District Judge

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DECLARATION OF ALEXANDER J. GINSBURG, ESQ.

I, ALEXANDER J. GINSBURG, ESQ., counsel for plaintiff, hereby Declare and affirm that the following is true and correct, to the best of my knowledge, information and belief:

1. I am counsel of record for plaintiff in this matter.
2. The facts as alleged in the Complaint are true and correct.
3. Defendants were duly served with the Complaint.
4. Defendants have failed to file an answer or other appropriate responsive pleading.
5. An Entry and Order of Default is appropriate as against said defendants, WILLIE J. MAXWELL, II d/b/a ZOO GANG TOURING and ZOO GANG MUSIC, LLC d/b/a ZOO GANG TOURING and a formal Motion for Default Judgment, requesting damages, shall ensue.

Dated: June 15, 2021

PETER BOWERS, P.C.

By: /Alexander J. Ginsburg, Esq.

Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I, Alexander J. Ginsburg, Esq. hereby certify that on this 15th day of June, 2021, pursuant to applicable Federal and Local Rule, a true copy of plaintiff's Request for Entry of Default and accompany documents were filed electronically and are available for viewing and downloading from the ECF system, and a copy thereof sent to said defendants' address, US. Regular 1st class mail, postage prepaid, being hand delivered to the post office and certificate of mailings issued by the postal authorities confirming the mailings as follows:

Willie J. Maxwell II dba Zoo Gang Touring, 800 Park Ave., Fort Lee, NJ 07024-3767

Zoo Gang Music, LLC d/b/a Zoo Gang Touring, 800 Park Ave., Fort Lee NJ 07024-3767

Attn:Willie J. Maxwell, II

Dated: June 15, 2021

PETER BOWERS, P.C.

By: /Alexander J. Ginsburg, Esq../

Counsel for Plaintiff